

**COLORADO DEPARTMENT OF HEALTH**

Richard D. Lamm
Governor

Thomas M. Vernon, M.D.
Executive Director

April 14, 1986

Mr. Ken Greer
U.S. Department of Energy
Rocky Flats Area Office
P.O. Box 928
Golden, Colorado 80402

Dear Mr. Greer:

As requested in Mr. John B. Whitsett's letter of March 24, 1986, the Colorado Department of Health Waste Management Division is providing its comments on the U.S. DOE Rocky Flats Plant Sampling and Analysis Plan for the Solar Pond 207A. Our comments are detailed by section number below.

1. Section 2.0 The background section should include a physical description of the pond including its lateral dimensions, total depth, water depth, and depth of sludge. The areas where wastes entered the impoundment and where they were discharged should also be indicated in this description.

2. Section 3.2.1 Only surface water samples are proposed. It is likely that the pond contents may be stratified in their compositions so sampling should be done at the surface, mid-depth, and bottom in each location. Also, in addition to sample locations along the mid-section of the pond, locations should be included at the areas where wastes entered or were withdrawn from the pond.

3. Section 3.2.2 Samples of sediment should be taken at the same locations as the liquid samples.

4. Section 3.3.1 The movement of the floating platform should be done in a manner that minimizes aeration of surface waters and limits mixing of stratified liquids and/or bottom sediments.

5. Section 3.3.1 Sample containers for VOA's should be immersed slowly in a manner that minimizes agitation and aeration as the container is filled.

6. Section 3.3.1 The conductivity meter should be calibrated in the field at the time of sampling. The sampling procedure should also include measurement of liquid depth and sediment depth at each sampling location.

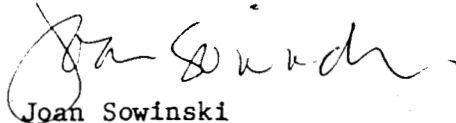
7. Section 3.3.1 A detailed description should be given for stratified liquid sampling procedures.

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8. Section 3.4 Conductivity meter calibration solutions and stratified liquid sampling equipment should be included in the equipment list.

We appreciate the opportunity to comment on the Pond 207A Sampling and Analysis Plan. If you have any questions concerning our comments, please contact Mr. Fred Dowsett of the Waste Management Division at (303) 320-8333 ext. 4364.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joan Sowinski".

Joan Sowinski
Section Chief
Compliance and Enforcement Section
Waste Management Division